

**BATHAE DUNNE LLP**

Yavar Bathae (CA 282388)  
Andrew C. Wolinsky (CA 345965)  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835  
yavar@bathaeedunne.com  
awolinsky@bathaeedunne.com

**BATHAE DUNNE LLP**

Brian J. Dunne (CA 275689)  
Edward M. Grauman (admitted *pro hac vice*)  
901 S. MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Tel.: (213) 462-2772  
bdunne@bathaeedunne.com  
egrauman@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser  
Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Amanda F. Lawrence (admitted *pro hac vice*)  
Patrick J. McGahan (admitted *pro hac vice*)  
Michael P. Srodoski (admitted *pro hac vice*)  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537  
alawrence@scott-scott.com  
pmcgahan@scott-scott.com  
msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW  
LLP**

Patrick J. Coughlin (CA 111070)  
Carmen A. Medici (CA 248417)  
Hal D. Cunningham (CA 243048)  
Daniel J. Brockwell (CA 335983)  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565  
pcoughlin@scott-scott.com  
cmedici@scott-scott.com  
hcunningham@scott-scott.com  
dbrockwell@scott-scott.com

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF SCOTT FASSER**

1 I, Scott Fasser, declare and state as follows:

2 1. I am a Principle Consultant and Team Lead for MarTech/MarComm Solutions and  
3 the Founder/Chief Digital Strategist for Brand Digital, Inc. I am also an Adjunct Professor at the  
4 University of Washington where I teach two courses on Digital Marketing. I have more than twenty-  
5 seven years of professional experience in digital advertising and related technologies. I have  
6 personal knowledge of the facts set forth in this declaration and, if called as a witness, could and  
7 would testify competently to such facts under oath.

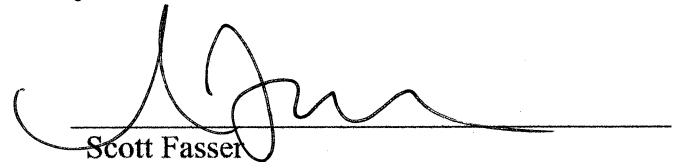
8 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned  
9 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' motion for  
10 class certification.

11 3. Attached hereto are the two reports I have prepared in connection with this  
12 assignment: the Expert Report of Scott Fasser, **(Exhibit A)** and the Reply Report of Scott Fasser,  
13 **(Exhibit B)**.

14 4. The attached reports accurately reflect my opinions on the matters contained therein.  
15

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on Sept. 14, in 2023.

18  
19   
20 Scott Fasser